

Murray Bilfield

From: Murray Bilfield <mbilfield@bilfieldandassociates.com>
Sent: Saturday, May 27, 2017 5:56 PM
To: 'madeline.dennis@tuckerellis.com'; 'edward.taber@tuckerellis.com'
Cc: 'David S. Hirt'; 'Sarah Kutscher'
Subject: Depos of Nancy Tichy & Gerry Miller

Counsel; At the deposition of Sidney Shanaberger yesterday 5/26/2017, we all agreed that the deposition of Nancy Tichy, a CCF employee will take place on June 15th. I would like her deposition to take place at my office as I am issuing deposition subpoenas for several witnesses, to take place at my office building conference room. Therefore I would like to start Ms. Tichy's deposition at 9:30 which I would expect to go no more than approx.. 45 minutes. There after the subpoenaed witnesses should be no more than 30 minutes each. I expect to subpoena 4 witnesses. I would like to than take the depositions of the following School Board employees starting at 1:30 pm; Nancy Barron, Susan Beatty, and James Dasher. I am willing to drive to the School Board Offices, although I think to economize our time it would be easier for them to report to my office, one hour apart; that is 1:30, 2:30, and 3:30 since we will already be together, and I have already accommodated the School Board on several previous occasions

We also agreed that the deposition of Gerry Miller will take place on June 19, 2017. I would also like that deposition to take place at 9:30 at my office. Kindly confirm by 12:00 noon on Tuesday May 30, 2017 if the 2 CCF witnesses can start on the respective days at 9:30am. If I don't hear from you to the contrary I will issue my subpoenas for the times indicated.

In addition, if the CCF can't, or won't produce the missing Harassment policies, as I have outlined in many letters, the last one dated May 16, 2017, and the missing 2003 Employee review of Dean Ochi, all for the deposition of Ms. Tichy, I will consider that those records have been intentionally misplaced, or destroyed and I will seek to amend the complaint, accordingly.

Lastly, I am waiting for the School Board to provide me an alternate date to conduct my inspection of the High School, recently requested, but denied, due the School still being in session.

